

EXHIBIT B

Joseph L. Grant
May 31, 2019

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, BOTH
INDIVIDUALLY AND AS LEGAL
GUARDIAN OF SHANE ALLEN
LOVELAND; AND JACOB SUMMERS,

Plaintiff,

vs.

CASE NO. 8:18CV127

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

DEPOSITION OF: JOSEPH L. GRANT

DATE: May 31, 2019

TIME: 9:00 a.m.

LOCATION: A. William Roberts Jr. & Associates
6135 Park South Drive
Charlotte, NC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: SOLANGE RUIZ-URIBE, Court Reporter

A. WILLIAM ROBERTS, JR., & ASSOCIATES
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1 A. Correct.

2 Q. Okay. Even though Goodyear says it is
3 defectively designed?

4 MR. BOTT: Object to form.

5 THE WITNESS: I'm not sure that -- where
6 do they say it was defectively designed? There was
7 never any recall of these tires, NHTSA never found
8 anything defective.

9 BY MR. LYNCH:

10 Q. You don't think Goodyear believes these
11 are defectively designed?

12 A. Not to the point where they -- that they
13 felt that there was a defect that made them
14 unreasonably dangerous to the point they would have
15 to recall them. No.

16 Q. Okay. So you don't believe-- they may be
17 defectively and may be unreasonably dangerous but
18 not to the point of recall?

19 A. That's Goodyear's position and that's what
20 I see in my analysis of the tires.

21 Q. All right. Two, the subject tire was
22 appropriately designed, manufactured, tested and
23 stands in compliance with the federal regulations
24 and industry standards in government tires. I'm
25 sorry. You say it's manufactured, but then they

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1 went back and remanufactured this tire with nylon
2 cap plies, didn't they?

3 A. They did make some changes including an
4 option nylon cap ply per some of the service
5 conditions that they saw there tires were being
6 used.

7 Q. But you don't believe that they
8 necessarily needed to do that because you believe
9 this tire was appropriately designed and
10 manufactured. So why would they ever go back and
11 redesign it?

12 A. Because of the changing conditions that
13 they saw in certain applications. It doesn't mean
14 in all applications but they saw, obviously saw a
15 need to change it for certain -- it doesn't mean
16 that, again, that in the vast majority of
17 applications tires are perfectly fine.

18 They didn't -- I go back to it. They
19 didn't recall them. If -- you know, I'm not a
20 Goodyear employee but I have dealt with tire
21 manufacturers enough, if they seriously thought
22 there was an issue that made them concerned from a
23 durability standpoint they would have recalled the
24 tires. That's my experience.

25 Q. When you say this tire was properly

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1 stamped, is this where you're talking about you're
2 disagreement with Lila?

3 A. No. It comes up more specifically toward
4 the end. I will offer you there is no government
5 requirement to stamp, you know, I'm talking about
6 federal and industry standards governing tires as
7 far as being appropriately stamped.

8 Q. Goodyear could certainly stamp a tire and
9 put a born on date, beer does it and bread does it
10 and other people do it, right?

11 A. So you want a second date. It already has
12 one date so you want a second date now. Sure, they
13 could put three or four dates on it.

14 Q. You think the average consumer knows how
15 to read a DOT?

16 A. Anybody that wants to know the date of the
17 tires are it's very easy for them to find out.
18 Anybody can. Anybody can. And especially someone
19 like Dandy Construction or more importantly Kerney
20 Towing who was doing the actual maintenance on --
21 the work on the tires.

22 They should know or they should be
23 able to easily find out what the -- what the year of
24 the manufacture of these particular tires, very
25 easy. We wouldn't have to go very far out of this

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1 room to find information if we really want to know
2 what the date was on the tire.

3 Q. You and I can do it, and you think the
4 court reporter here knows how to read the date on
5 the tire?

6 A. If she wanted to know and she wanted to
7 take that responsibility other than letting her tire
8 professional know.

9 BY MR. LYNCH:

10 Q. For the record, she said she doubted it?

11 A. She can find out. I would offer her to
12 Google it or ask Siri even and you would easily come
13 up with something.

14 Q. It's sort of hidden in the DOT code,
15 right?

16 A. No. It's very easy to find. And I'll
17 offer, just so you're aware, we haven't talked about
18 it, but I will offer you surveys that I've been
19 involved with, with thousands and thousands of
20 tires, all different manufacturers around the world,
21 there is no one, no one that puts that type of
22 information on the sidewall of the tire.

23 Q. The subject tire experienced a detachment
24 of portion of the tread and top belt. We talked
25 about this entire --

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CERTIFICATE OF REPORTER

I, Solange Ruiz-Urbe, Notary Public for the State of North Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 31st day of May, 2019 at Charlotte, Mecklenburg County, North Carolina.

Solange Ruiz-Urbe
My Commission expires
March 7, 2022